

# Holland & Knight

31 West 52nd Street | New York, NY 10019 | T 212.513.3200 | F 212.385.9010  
Holland & Knight LLP | www.hklaw.com

Duval M. Thompson  
(212) 513-3263  
duval.thompson@hklaw.com

October 20, 2015

## Via EPA Website

Wanda Calderon  
FOIA Specialist  
United States Environmental Protection Agency  
Region 2  
290 Broadway, 26th Floor  
New York, NY 10007

Re: EPA ID# NJD981557879 at 333 Hamilton Blvd., South Plainfield, NJ - Consent Agreement & EPA ID# NJSFN0204260 at Woodbrook Road Dump

Dear Wanda:

Pursuant to the Freedom of Information Act, 5 U.S.C. §§ 552, *et seq.* ("FOIA"), this request concerns the Cornell-Dublier Electronics, Inc. ("CDE") superfund sites, located at 333 Hamilton Blvd., South Plainfield, NJ, EPA ID# NJD981557789. On behalf of Exxon Mobil Corporation ("Exxon"), we request the Proposed and Final Consent Decrees for the following cases and Superfund Sites identified by either case-caption or EPA ID#:

- *United States v. Beckman Coulter, Inc. et al.*, Civil Action No. 98-CV-4812 (WHW) - Combe Fill South Landfill – EPA ID# NJD094966611;
- *United States v. Chemical Leaman Tank Lines, Inc.*, Civil Action No. 00-CV-5715 (SSB) - Chemical Leaman Tank Lines, Inc. – EPA ID# NJD047321443;
- NL Industries – EPA ID# NJD061843249; and
- Raritan Bay Slag – EPA ID# NJN000206276.

FOIA requires the release of all reasonably segregable portions of information which are not themselves exempt. *See* 5 U.S.C. § 552(b). If, for any reason, materials reasonably within

Wanda Calderon  
October 20, 2015  
Page 2

the scope of this request are withheld as failing under FOIA exemption or exemptions covered by 5 U.S.C. § 552, please identify and describe, with specificity, each document being withheld, the basis for withholding it, and whether any exempt material can be deleted thereby allowing the document with deleted portions to be provided. We are aware of our rights to administrative appeal set forth in 5 U.S.C. § 552(a)(6)(A)(I) and are prepared to pursue them if necessary.

If you have any questions please contact me at (212) 513-3263. Your prompt attention to this request is appreciated.

Very truly yours,

*/s/ Duvol M. Thompson*

Duvol M. Thompson